

1 [Submitting Counsel below]

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6 IN THE UNITED STATES DISTRICT COURT

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8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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10 IN RE: UBER TECHNOLOGIES, INC.,
11 PASSENGER SEXUAL ASSAULT
12 LITIGATION

13 This Document Relates to:

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15 *Jaylynn Dean v. Uber Techs., Inc.*,
16 N.D. Cal. No. 23-cv-06708
17 D. Ariz. No. 25-cv-4276

18 Case No. 23-md-03084-CRB

19 **ADMINISTRATIVE MOTION TO
20 CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

21 Under Civil Local Rules 7-11 and 79-5(f), Plaintiff moves the Court to consider whether
22 material designated confidential by Uber or third parties associated with Uber should be sealed.

23 On December 17, 2025, Plaintiff filed her Opposition to Uber's Motion to Quash Trial
24 Depositions which refers to and attaches documents that Uber or third parties associated with
25 Uber designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" and / or
26 "CONFIDENTIAL."

27 **Material To Be Filed Under Seal**

28 The material to be filed under seal is portions of Plaintiff's Opposition and the attached
exhibits. Documents also addressed in Plaintiff's affirmative sealing motion are indicated with a
star.

29 Document	30 Description	31 Designating Party
32 [Unredacted] Plaintiff's Opposition to Uber's Motion to Quash Trial Depositions	33 Portion of briefing referring to documents and testimony designated highly confidential and confidential	34 Uber

Document	Description	Designating Party
Exhibit A	Henry (Gus) Fuldner 3/26/2025 and 3/27/2025 deposition transcript	Uber
Exhibit B	Katy McDonald 5/7/2025 deposition transcript	Uber
Exhibit C	Sunny Wong 6/25/2025 deposition transcript	Uber
Exhibit D	Sunny Wong 10/14/2025 deposition transcript	Uber

Under Local Rule 79-5(f)(3), the designating entities bear the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Maya R. Kalonia in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: December 17, 2025

Respectfully submitted,

By: /s/ Sarah R. London

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6 **FILER'S ATTESTATION**

7 I am the ECF User whose ID and password are being used to file this document. In
8 compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this
9 filing.

10 Dated: December 17, 2025

11 By: /s/ Andrew R. Kaufman

12 Andrew R. Kaufman

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